

April 8, 2020

BY E.C.F.

Honorable Judge Edgardo Ramos  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007  
Tel (212) 805-0294  
Courtroom 619 Chambers  
NYSDRamos@nysd.uscourts.gov

## MEMO ENDORSED

Re: *Curkin, et al. v. City of New York*.  
18 Civ. 07541 (ER)

Your Honor:

I represent Plaintiffs Seth Curkin, Parastou Marashi, and myself, P. Jenny Marashi, in the above captioned case. City attorney Frank DeLuccia and Plaintiffs are writing this joint letter to respectfully request a sixty (60) day extension of time to complete discovery in the instant matter, from April 10, 2020 to June 10, 2020. This is the parties' first request for an extension of the discovery deadline in this matter. The parties also respectfully request an adjournment of the case management conference currently scheduled for April 17, 2020 at 10:00 am to a date convenient for the Court following June 10, 2020. Other than the date of the above-referenced conference, this request for an extension does not affect any other dates or deadlines in this matter.

According to the Civil Case Management Plan and Scheduling Order submitted by the parties and approved by this Court on June 20, 2019, discovery was scheduled to close by April 10, 2020. The parties have been exchanging discovery and have conducted several depositions. However, several depositions of parties and witnesses remain outstanding to date, either in whole or in part. The parties respectfully request that the discovery deadline be extended due to the inability of the parties to complete the remainder of the necessary depositions and other related discovery by the current deadline. As the Court is aware, the ongoing coronavirus pandemic in New York City has heavily impacted and disrupted normal business operations in the City of New York generally and for the parties specifically, particularly given Governor Cuomo's recent orders. A sixty (60) day extension of the discovery deadline will accommodate these unprecedented and rapidly-developing circumstances, including further anticipated delays and complications from staffing shortages as more and more people must work from home, shelter in place, and generally avoid contact with one another.

The parties thank the Court for its consideration of their request.

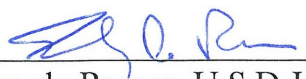
Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
P. Jenny Marashi  
*for Plaintiffs*

*cc: Frank DeLuccia (by ECF)*

The request to extend the deadline to complete discovery to June 10, 2020 is GRANTED. The case management conference is adjourned to June 23, 2020 at 11:00 AM.

IT IS SO ORDERED.

  
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Edgardo Ramos, U.S.D.J  
Dated: 4/9/2020  
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New York, New York